

— aspen surgical. —

# CODE OF CONDUCT

Ethics and Integrity

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**STEVE BLAZEJEWSKI**  
CHIEF EXECUTIVE OFFICER

## MESSAGE FROM THE CEO

Dear Colleagues,

As we continue to grow and expand our global footprint, our Aspen Surgical Code of Conduct ensures that we continue to uphold the high standards we set for ourselves as a company. This Code represents not just a set of guidelines, but a reflection of who we are, what we stand for, and how we work together to make a positive impact on the world.

At Aspen, we are united by five core values that guide everything we do: **Integrity, Collaboration, Customer Focus, Accountability, and Innovative Spirit**. These values shape our culture and influence how we make decisions, engage with one another, and serve our customers and communities. The Global Code of Conduct is designed to support these values and provide a clear framework to ensure we live them every day.

**Integrity** is at the core of our success. It means doing the right thing, even when no one is watching, and it forms the foundation of every interaction we have, whether with colleagues, customers, or partners. Our commitment to **Collaboration** fosters a culture where diverse perspectives are valued, and teamwork drives us to deliver outstanding results. **Customer Focus** ensures that everything we do is centered around the needs of those we serve, putting them first in our decisions and actions. **Accountability** holds us responsible for our commitments and results, creating a culture of trust where we deliver on our promises. Finally, our **Innovative Spirit** encourages us to think outside the box, embrace change, and continuously seek ways to improve and adapt.

This Code of Conduct is not just a set of rules; it is a shared commitment to each other and to the values that define us. As we grow, it's more important than ever that we are aligned in how we approach every challenge and opportunity. By adhering to these principles, we ensure that we build a company that is respected, trusted, and poised for long-term success.

I encourage you all to read through the Global Code of Conduct and reflect on how these values guide your day-to-day work. Together, we will continue to lead with integrity, collaborate with purpose, serve our customers with excellence, hold ourselves accountable, and embrace innovative thinking to shape our future.

Thank you for your dedication and commitment to fulfilling our mission of earning trust, across the procedures of today and tomorrow, by delivering a broad portfolio and creating clinical, economic, and relationship value.

Warm Regards,

*Steve Blazejewski*



# 1 Company Purpose, Mission, and Values



aspen surgical®



## OUR PURPOSE

To provide clinicians with the tools to advance the entire perioperative experience.



# OUR MISSION

We earn trust – across the procedures of today and tomorrow – by delivering a broad portfolio and creating clinical, economic, and relationship value.



## ACCOUNTABILITY

We deliver  
on our  
commitments



## INTEGRITY

We do  
the right  
thing



## COLLABORATION

We work together  
We win together



## CUSTOMER FOCUS

We start with the  
customer and  
patient in mind



## INNOVATIVE SPIRIT

We are inquisitive,  
pushing boundaries



# OUR VALUES

How we show up as a team to  
fulfill our purpose and mission.



## a Statement of Responsibility

As a surgical products company, we value the safety, well-being and health of individuals worldwide. Our commitment to quality and safety extends from the development and manufacturing of our products to their distribution and use. We adhere to applicable regulatory and compliance standards, ensuring that our products meet or exceed industry benchmarks. Moreover, we are dedicated to continuous innovation, striving to provide clinicians with the tools to advance the entire perioperative experience.

We also understand our responsibility to extend our philosophy throughout our supply chain. We strive to source products and services from suppliers that share our values and commitment to quality and safety. We carefully select our partners based on rigid criteria that is consistently monitored and enforced.

## b Publication, Training, and Communication

This Code of Conduct is available to all employees through our company's intranet. Additionally, employees, customers, vendors and suppliers have access to this Code of Conduct through the company's webpage. New employees receive the Code of Conduct during their onboarding process, and employees are required to complete periodic refresher training.







## C

### Compliance Hotline and Compliance Officer

We maintain a confidential ethics and compliance hotline, which is available 24/7, for employees, customers, vendors, or suppliers to report any concerns or suspected violations of this Code of Conduct. Reports or suspected violations can be made by calling the Aspen Ethic Hotline. The company's compliance officer and Chief Financial Officer, Greg Muller, oversees all compliance efforts. He or his designees ensure investigations and appropriate corrective actions are taken when necessary.

The Ethics Hotline can be accessed online at <https://report.syntrio.com/aspensurgical> or by phone Toll-Free at:

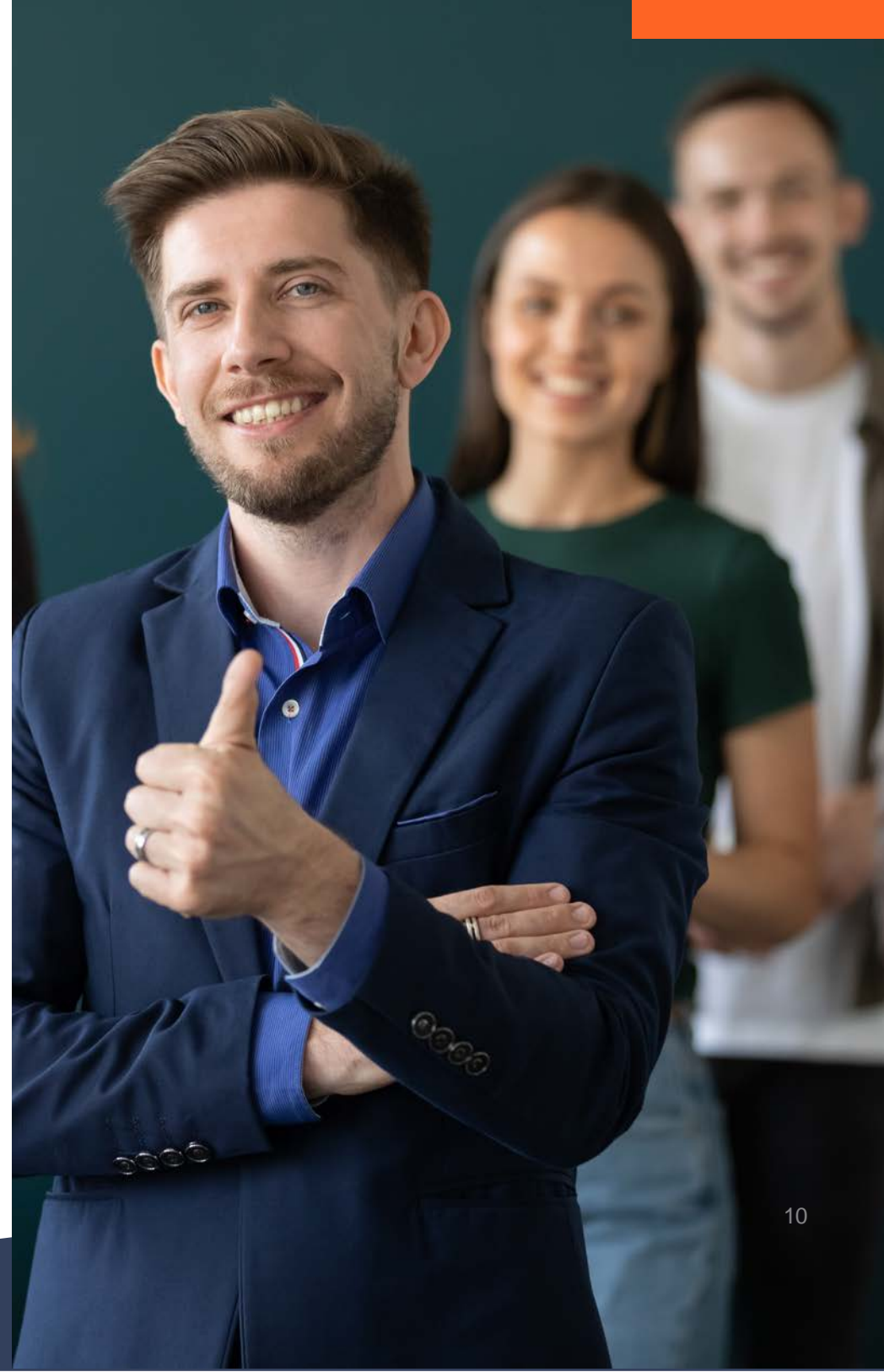
- English-speaking USA and Canada: 833-561-8057
- Spanish-speaking USA and Canada: 800-216-1288
- French-speaking Canada: 855-725-0002
- Spanish-speaking Mexico: 800-681-5340
- All other countries: 800-603-2869

## d No Retaliation

We staunchly prohibit any form of retaliation against individuals who, in good faith, report concerns, violations, or potential breaches of our Code of Conduct. We value open communication and recognize that reporting such matters is essential to maintaining a safe, ethical, and compliant work environment. Any act of retaliation, whether direct or indirect, will be treated with the utmost seriousness and will result in appropriate disciplinary action, up to and including termination of employment or contract. We are committed to fostering a culture of trust and accountability, where every individual feels empowered and protected when they come forward with genuine concerns.

## e Compliance with Laws and Regulations

Within our company, adherence to applicable laws and regulations is non-negotiable. We are committed to upholding the highest legal standards in every aspect of our operations. This commitment extends to our interactions with customers, partners, and competitors, as well as our treatment of employees. Regular compliance assessments, audits, and reviews are conducted to ensure adherence to these laws and regulations. Any deviation from legal requirements will be investigated and addressed promptly, with appropriate corrective action taken and, if necessary, reported to the relevant authorities. Upholding compliance is fundamental to our integrity and essential to maintaining the trust of our stakeholders.





# 2 Employee/HR





## **a** Non-Discrimination/Equal Opportunity Employer

We are an Equal Opportunity Employer and committed to non-discrimination in our employment or business practices because of race, color, religion, sex, age, marital status, national origin, veteran status, disability, sexual orientation, gender identity, genetic information or any other characteristic protected by applicable law. If you believe you or someone else has been discriminated against, you should contact your Human Resource Business Partner or the Vice President of Human Resources immediately. Reference country specific equal employment policies.

## **b** Harassment Free Workplace

It is important that we treat each other with respect in terms of all protected characteristics. Therefore, we prohibit all forms of harassment in employment and business practices because of race, color, religion, sex, age, marital status, national origin, veteran status, disability, sexual orientation, gender identity, genetic information or any other characteristic protected by applicable law. If you believe you or someone else has been harassed, you should contact your Human Resource Business Partner or the Vice President of Human Resources immediately.



## C

### Safety

We are committed to maintaining a safe workplace for all of our team members. It is very important that we all follow our safety rules and report any unsafe conditions or potential hazards to your direct supervisor or the Environmental, Health, and Safety (EHS) Manager immediately. Reference country or site-specific workplace safety policies.

## d

### Drug-Free Workplace

Aspen believes employees should work in a safe and productive environment. The manufacture, distribution, dispensation, solicitation, possession, sale, purchase, transfer, transportation, concealment, consumption, or use of alcohol and/or illegal drugs, including controlled, mind-altering and intoxicating substances, on Company property or on Company time, subjects employees and visitors to unsafe conditions, and is, therefore, strictly prohibited. Reference country specific drug and free workplace policies.







## e Conflicts of Interest / Improper Payments

We act in the company's best interest at all times. No employee should place themselves in a situation in which they, rather than the Company, profits from a business transaction. Employees are required to disclose potential conflicts of interest with any customer or supplier to the Chief Financial Officer. At no time should you perform work or render services for compensation of any kind for an organization with which the Company does business without the express written consent of the Company.

## f Nepotism

Aspen has some workplace sites in smaller town and is pleased to consider friends and relatives of current employees for employment opportunities. To maintain the confidence of our employees in our hiring and promotion decisions, and to prevent conflicts of interests, family members and those with individuals with personal relationships may not make employment decisions regarding each other. If direct or indirect reporting relationships are allowed in a particular country or site, any employment decision will be reviewed and approved by HR and the site leader. Reference country specific policies on the employment of relatives.



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## Wages

We pay employees fairly and legally. All wages, including overtime, are paid in compliance with the relevant country and state laws. If you believe your pay is incorrect, please notify Human Resources as soon as possible.

h

## Expense Reporting

All employees are required to promptly and accurately report all expenses incurred during the course of business. This includes travel, entertainment, and any other reimbursable expenditures. Every expense report should reflect the true nature of the expenses and must be accompanied by complete and accurate receipts in compliance with company policy, as well as all applicable laws and regulations. Expenditures on gifts and entertainment must comply with policy and should never be excessive, inappropriate, or have the potential to compromise professional judgment. The company reserves the right to audit expense reports at any time. Company personnel are accountable for their expense claims and should cooperate with any audit requests. Employees can reference their Travel and Expense reporting policy.



**i**

## **Required reporting of expenses involving healthcare professionals**

When reporting expenses involving interactions with healthcare professionals, in addition to the company's general expense reporting guidelines, company personnel must ensure strict compliance with all applicable laws, industry regulations, ethical standards, and this Code of Conduct. Employees must disclose financial relationships with healthcare professionals and organizations as required by law, and all interactions with healthcare professionals facilitated by third-party vendors or intermediaries must be in full compliance with our policies and industry regulations. Employees can reference their Travel and Expense reporting policy.



# 3 Customer Relationships



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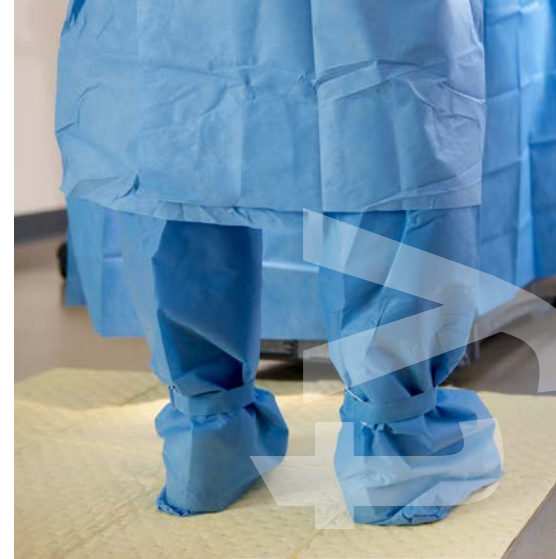
## Respect for Clinical Judgment

We deeply respect the expertise and clinical judgment of healthcare professionals. We understand that they play a critical role in patient care, and their decisions should be valued and supported. Our products are designed to complement and enhance their skills, and we commit to providing them with the highest quality tools and resources to ensure optimal patient outcomes. We encourage open communication and collaboration between our company and healthcare practitioners, valuing their insights and expertise in the development and improvement of our surgical products. We also emphasize that our interactions with medical professionals will be conducted with the utmost integrity, avoiding any undue influence or pressure, and ensuring that their clinical judgment remains independent and unbiased.

b

## Product Quality and Safety

We understand that all employees are responsible for quality and safety. Our commitment to product quality and safety touches all stages of the development, manufacturing, and distribution process. By following strict quality processes and adhering to industry standards, we ensure that our products meet the highest quality and safety standards. We are committed to delivering safe and effective products and speaking up when we have concerns related to product safety and quality. If we are made aware of customer concerns regarding quality or safety, we investigate such concerns seriously and make reports to relevant third-party authorities, where appropriate. Employees can reference the Aspen Quality Policy.







## c Lawful Promotion and Advertising

Communicating truthful and accurate information about our products to our customers is of high priority. Our marketing and promotional activities comply with all applicable laws and regulations. We do not engage in false or misleading advertising practices. We support the responsible and ethical promotion of our products, backed by scientific evidence.

## d Supplier Code of Conduct Requirements

Who we choose to partner with has the potential to significantly impact our business operations, reputation and community partnerships. Therefore, we are careful to choose business partners who align with our purpose, mission and core values while supplying quality products our customers have come to expect. We expect our suppliers to adhere to ethical and environmental standards, including labor practices, safety, and environmental responsibility, which are detailed in our Aspen Global Third-Party Code of Conduct.



e

## Anti-Bribery/Corruption

As integrity is one of our core values, we strive to work with integrity in every aspect of our business. We strictly prohibit bribery and corruption in all our business dealings. We do not give, offer, promise, solicit, or accept bribes, kickbacks, or other illegal payments. We will never act this way, nor will we ever ask our partners to act in a way we find inappropriate.

f

## Anti-Collusion/Anti-Trust Compliance

Fair competition leads to better choices for customers and promotes ingenuity and progress for our business. We adhere to antitrust laws and regulations, which prohibit anti-competitive behavior, collusion, price-fixing, and other antitrust violations. These laws determine how we can fairly compete and interact with other companies and competitors. Adhering to them allows us to work with integrity.

g

## Global Trade Compliance

We comply with all import and export laws and regulations governing the movement of our products across international borders. Our international business activities are conducted with the utmost integrity and in full compliance with all applicable laws, including trade rules and export controls.





# 4 Protection of Company Assets





## a Confidentiality of Information

Maintaining the confidentiality of sensitive information is paramount to our company. All employees, contractors, and stakeholders are entrusted with safeguarding proprietary, customer, and employee information. This includes but is not limited to trade secrets, financial data, and personal information. Unauthorized disclosure or use of confidential information is strictly prohibited and may result in severe consequences, including disciplinary or legal action.

## b Data Privacy and Protection

We are dedicated to upholding the highest standards of data privacy and protection. All personal and sensitive information collected and processed must be handled in accordance with applicable laws and industry best practices. This includes obtaining proper consent, implementing secure storage and transmission methods, and promptly addressing any data breaches. Compliance with data protection regulations is a fundamental responsibility for every member of our company.





## C

## Systems Security

Maintaining the security and integrity of our information systems is vital to our operations. All users are expected to adhere to strict security protocols, including secure password practices, regular software updates, and safeguarding against unauthorized access. Users are expected to comply with the company policy on Use Of Company Computers/Equipment and Digital Information. Additionally, individuals must promptly report any suspicious activities or potential security breaches to the IT department. Failure to comply with these security measures may lead to disciplinary action.



## d

## Electronic Devices

Employees are expected to use electronic devices provided by the company responsibly and in alignment with our policies. Personal devices used for work-related purposes are required to adhere to company security standards. Users are expected to exercise caution when accessing sensitive information on mobile devices and ensure that they are not left unattended in public spaces. Unauthorized sharing of company-owned electronic devices or using them for non-work-related activities is strictly prohibited.

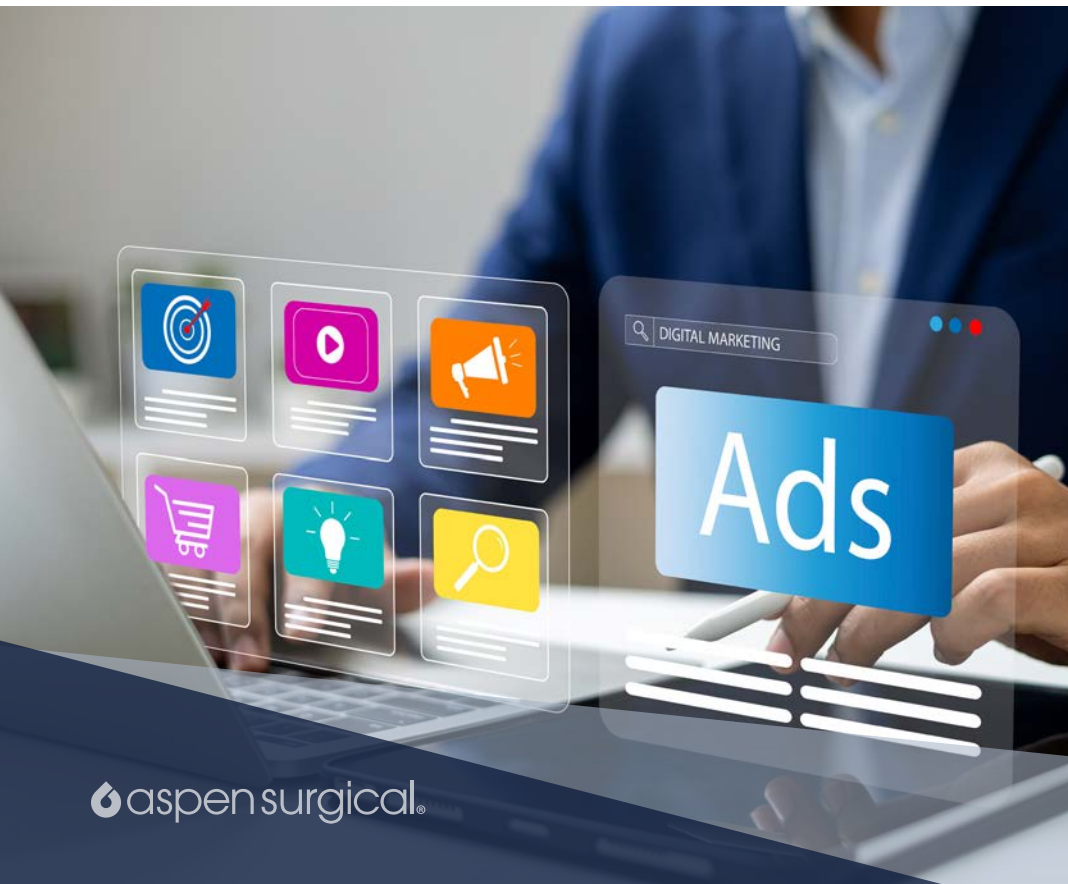




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## Records Retention/ Cooperation with Investigations

Proper records retention is essential for legal and regulatory compliance, as well as for maintaining sound business practices. Employees are required to retain and dispose of company records in accordance with established policies. Furthermore, all employees are expected to fully cooperate with internal and external investigations, providing accurate and truthful information as required by law.



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## Social Media Policy

When representing our company on social media platforms, employees should exercise sound professional judgment. It is imperative to refrain from sharing confidential information, making defamatory statements, or engaging in activities that could harm the reputation of the company. Additionally, employees should be aware that their personal social media activity may reflect on the company and should act responsibly and in a manner consistent with our values.



## g

## Copyright Laws

Respecting copyright laws is essential to maintaining the integrity of intellectual property rights, both within and outside our company. Unauthorized reproduction, distribution, or modification of copyrighted material is strictly prohibited. Employees should obtain proper licenses or permissions when using copyrighted materials for work-related purposes, and respect the rights of creators and content owners in all their activities.



# 5 Community







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## General Statement of Corporate Responsibility

Our company is committed to operating ethically, responsibly, and with utmost integrity. We hold ourselves accountable for our actions and their impact on society, striving to contribute positively to the communities we serve. Through transparent business practices and adherence to legal and ethical standards, we aim to build trust among our stakeholders and uphold our commitment to corporate responsibility.

b

## Environmental Standards/ Sustainable Practices

We are dedicated to environmental stewardship and sustainable business practices. Our commitment to minimizing our ecological footprint includes adopting energy-efficient technologies, reducing waste, and sourcing materials responsibly. We actively seek opportunities to support environmental conservation efforts and work towards a more sustainable future for our planet.

C

## Child Labor

We do not tolerate any form of child labor. We do not hire employees who are below the legal working age, and we do not allow staffing agencies to provide under-age employees at our facilities. We also do not partner with suppliers who fail to respect ethical labor practices.

d

## Human Trafficking and Modern Slavery

We unequivocally condemn human trafficking and modern slavery. We maintain rigorous due diligence processes to ensure that our operations and supply chains are free from any form of forced labor or exploitation. By adhering to established ethical sourcing practices and collaborating with reputable partners, we aim to combat this global issue and contribute to a fair and just society.







e

## Political Activities/ Contributions

Our company is committed to transparent and responsible engagement in political activities by our company and our employees, if they choose to participate. To the extent the company participates in political activities, we strictly adhere to all applicable laws and regulations governing such activities and political contributions, ensuring that they align with our values and business objectives. We do not endorse or engage in any form of political activity that conflicts with our commitment to ethical conduct, transparency, and integrity.



f

## Freedom of Association and Collective Bargaining

We support employees freedom of association. The right to freedom of association is the right of everyone to form and to join trade unions for the protection of their interests. This includes collective bargaining, as a process of negotiations between employers and a group of employees, aimed at reaching an agreement that regulates working conditions.



Code of Conduct - 2025 Edition